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Attorneys for Defendants  
CITY AND COUNTY OF SAN FRANCISCO,  
PAUL MIYAMOTO IN HIS OFFICIAL CAPACITY AS  
SAN FRANCISCO SHERIFF

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
OAKLAND DIVISION

JOSHUA SIMON, DAVID BARBER, AND  
JOSUE BONILLA, INDIVIDUALLY AND  
ON BEHALF OF ALL OTHERS  
SIMILARLY SITUATED, DIANA BLOCK,  
AN INDIVIDUAL AND COMMUNITY  
RESOURCE INITIATIVE, AN  
ORGANIZATION,

Plaintiffs,

vs.

CITY AND COUNTY OF SAN  
FRANCISCO, PAUL MIYAMOTO, IN HIS  
OFFICIAL CAPACITY AS SAN  
FRANCISCO SHERIFF,

Defendants.

Case No. 4:22-cv-05541-JST

**DECLARATION OF KAITLYN MURPHY IN  
SUPPORT OF DEFENDANTS'  
ADMINISTRATIVE MOTION TO SEAL**

Judge: Hon. Jon S. Tigar  
Courtroom: Courtroom 6, 2nd Floor

Trial Date: Not Set

**DECLARATION OF KAITLYN MURPHY**

I, KAITLYN MURPHY, declare as follows:

1. I am an attorney admitted to practice law in the State of California and before this Court. I am a Deputy City Attorney with the Office of the City Attorney for the City and County of San Francisco and am counsel of record for Defendants the City and County of San Francisco and Sheriff Paul Miyamoto in the above-captioned litigation. I have personal knowledge of the facts contained herein, and could and would testify competently thereto.

2. I submit this declaration in support of Defendants' Administrative Motion to Seal.

3. Exhibits A-E and G to the Declaration of Lieutenant Kevin Lee in Support of Defendants' Opposition to Plaintiffs' Motion for a Preliminary Injunction ("Lee Declaration") are six San Francisco Police Department ("SFPD") Incident Reports concerning Plaintiffs Joshua Simon, David Barber, and Josue Bonilla ("Criminal Defendant Plaintiffs").

4. These Incident Reports are relevant to Defendants' Opposition to Plaintiffs' Motion for a Preliminary Injunction ("Opposition") because they tend to show the risks to the public in general and the Criminal Defendant Plaintiffs' alleged victims in particular if the Court were to issue Plaintiffs' requested injunction modifying the terms of their pretrial release.

5. The Incident Reports concern allegations of domestic violence. Although Defendants redacted names, addresses, and contact information in these documents where irrelevant to the pending motion, production of the remaining portions of the documents to the public could nevertheless lead to the inadvertent harms to the victims given that the Penal Code violations discussed in the Incident Reports (felony domestic violence) narrow the pool of potential victims considerably.

6. Disclosure would also impact ongoing criminal investigations as the SFPD Incident Reports concern the Criminal Defendant Plaintiffs' underlying criminal charges.

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7. Defendants' request is narrowly tailored as it seeks only to seal the portion of Defendants' supporting evidence that create a risk to crime victims and criminal investigations. Defendants have drafted their brief to avoid disclosing these sealed facts directly and therefore have not requested to seal their Opposition itself.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct and that this declaration was executed on this 28th day of October 2022, at San Francisco, California.

*/s/ Kaitlyn Murphy*  
**KAITLYN MURPHY**